

ROBERT L. ARLEO, ESQ. P.C.
380 Lexington Avenue, 17th Floor
New York, N.Y. 10168

Telephone: (212) 551-1115
Email: robertarleo@gmail.com

Fax: (518) 751-1801

August 9, 2018

Honorable Pamela K. Chen
District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Abreu v. Receivable Collection Services, LLC
18-cv-04103 (PKC)(LB)

Dear District Judge Chen:

I am counsel for Receivable Collection Services, LLC, the Defendant named in the above-entitled lawsuit. I write in supplement to my letter motion dated August 2, 2018 asking Your Honor to retain jurisdiction over the above-entitled lawsuit so that the Defendant may file a motion for fees and costs pursuant to 28 U.S.C. § 1927 and pursuant to the “inherent power” of the Court (Dkt. No. 6).

It seems that the above-entitled lawsuit is not the only baseless FDCPA lawsuit filed by Plaintiff’s counsel, Edward Geller, as Of Counsel to M. Harvey Rephen & Associates, P.C. I attach herewith as Exhibit “1” a copy of the report and recommendation dated August 6, 2018 and issued by Magistrate Judge Kathleen Tomlinson in the lawsuit *Cameau v. National Recovery Agency*, 15-cv-02861 (DRH)(AKT). Therein, Magistrate Judge Tomlinson recommended that District Judge Denis Hurley compel Mr. Geller to pay attorneys fees and costs incurred by a debt collector, pursuant to Fed. R. Civ. P. 11, in defense of another baseless Fair Debt Collection Practices Act (FDCPA) lawsuit. I attach herewith as Exhibit “2” a copy of the *Cameau* Complaint.

I ask Your Honor to consider the attached report and recommendation in conjunction with the herein Defendant’s request for attorneys fees and costs.

Respectfully submitted,

/ s / *Robert L. Arleo*

Robert L. Arleo

RLA:gra cc: All attorneys of records via ECF